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August 12, 2022

VIA ECF-PACER

Hon. Ann Marie Donio, U.S. Magistrate Judge
United States District Court
Mitchell H. Cohen Building & U.S. Cthse.
4th & Cooper Streets, Room 6020
Camden, NJ 08101

**Re: Maurice Gordon, et al v. Randall Wetzel, et al.
Civil Action No: 21-4861 (KMW/AMD)**

Dear Judge Donio:

By substitution of attorney dated August 10, 2022 (copy attached for ease of reference), this office assumed representation of defendants Grewal and Callahan in the above-referenced matter. We are aware that, by Text Order dated August 8, 2022, "Counsel for defendants Grewal and [Callahan] shall, by no later than 8/15/2022, submit an Affidavit to the Court setting forth if there is a searchable database available as to all use of force based complaints from 2015 through 2020, and also what efforts, if any, have been made to date to discover if such searchable database exists, as set forth on the record on 8/8/2022."

This letter is to request, with the consent of plaintiffs' counsel, a two-week extension of the due date for filing of the ordered Affidavit to the Court. We have been working with predecessor counsel to prepare the required Affidavit but the transitional circumstances make the August 15 deadline impracticable.

In seeking and obtaining the consent of plaintiffs' counsel to this request, I have committed to produce without delay any previously unproduced searchable database that the ongoing double-check and renewed search efforts may yield. Plaintiffs' attorneys have requested that I memorialize that commitment in this letter and I have no problem doing that.

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Thank you for your consideration of this request.

Respectfully yours,

**DECOTIIS, FITZPATRICK, COLE
& GIBLIN, LLP**

By: /s/ Benjamin Clarke
Benjamin Clarke

BC/md

Encl.

cc: DAG Matthew Lynch
All Counsel of Record (via ECF)

So Ordered this 18th day of August 2022

s/ Ann Marie Donio

By: ANN MARIE DONIO, U.S.M.J.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

MAURICE GORDON, SR. individually and as
Administrator of the ESTATE of MAURICE
GORDON, JR., et al.

Plaintiffs,

v.

RANDALL WETZEL, et al.,

Defendants.

Civil Action No: 21-4861 (KMW/AMD)

**SUBSTITUTION
OF ATTORNEY**

The undersigned hereby consents to the substitution of DeCotiis, FitzPatrick, Cole & Giblin, LLP (Benjamin Clarke, Esq., appearing) as attorneys for defendants Gurbir Singh Grewal and Patrick J. Callahan in the above captioned matter.

WITHDRAWING ATTORNEY:

**MATTHEW LYNCH
DEPUTY ATTORNEY GENERAL**

By: /s/ Matthew Lynch
Matthew Lynch
Deputy Attorney General

Dated: August 9, 2022

SUPERSEDING ATTORNEY:

**DECOTIIS, FITZPATRICK, COLE
& GIBLIN, LLP**

By: /s/ Benjamin Clarke
Benjamin Clarke

Dated: August 9, 2022